

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr. Governor

Thomas W. Easterly
Commissioner

April 7, 2009

Northwest Regional Office 8380 Louisiana Street Merrillville, Indiana 46410 (219) 757-0265 Toll Free (888) 209-8892 Fax (219) 757-0267 www.idem.IN.gov

VIA CERTIFIED MAIL 7002 0510 0002 5825 2892

Mr. Robert H. Lange U. S. Steel, Gary Works 1 North Broadway Gary, IN 46402

RE:

Referral to USEPA, Region 5

U.S. Steel, Gary Works

Plant ID Number: 089-00121

Gary, Lake County

Dear Mr. Lange:

The Third (3rd) Quarter 2008 Reports (July 1, 2008 through September 30, 2008) submitted by you on October 17, 2008, identified the following deviations:

- (1) Permit Condition D.2.4(e)(1): On July 02, 2008 the allowable visible emissions for coke oven offtake leaks (5%) was exceeded (6.7%) during compliance monitoring on No.2 Coke Battery.
- (2) Permit Condition D.2.4(a) and D.2.5(e): On July 16, 2008 the allowable visible emissions for coke oven door (10%) was exceeded (12.7%) during compliance monitoring on No.7 Coke Battery.
- (3) Permit Condition D.2.26 On July 25, 2008 You must be in compliance with the emissions limitations, work practice standards, and operation and maintenance requirements in this subpart at all times, except during periods of startup, shutdown and malfunction as defined by 63.2.
- (4) Permit Condition D.2.4(c)(2): On August 12, 2008 the allowable visible emissions for coke oven pushes (20% opacity) was exceeded (32.5%) during compliance monitoring on No. 2 Coke Battery.
- (5) Permit Condition D.2.4(e)(1): On August 27, 2008 the allowable visible emissions for coke oven offtake leaks (5%) was exceeded (7.3%) during compliance monitoring on No.2 Coke Battery.
- (6) Permit Condition D.2.4(e)(1): On September 02, 2008 the allowable visible emissions for coke oven offtake leaks (5%) was exceeded (6.8%) during compliance monitoring on No.2 Coke Battery.
- (7) Permit Condition D.2.4(e)(1): On September 04, 2008 the allowable visible emissions for coke oven offtake leaks (5%) was exceeded (5.6%) during compliance monitoring on No.2 Coke Battery.

Mr. Robert H. Lange U. S. Steel, Gary Works

#### Page 2

(8) Permit Condition D.2.4(e)(1): On September 05, 2008 the allowable visible emissions for coke oven offtake leaks (5%) was exceeded (5.6%) during compliance monitoring on No.2 Coke Battery.

The Fourth (4th) Quarter 2008 Reports (October 1, 2008 through December 31, 2008) submitted by you on January 22, 2009, identified the following deviations:

1. Permit Condition D.2.4(a) and D.2.5(e): On December 20, 2008 the allowable visible emissions for coke oven door (10%) was exceeded (12.0%) during compliance monitoring on No.5 Coke Battery.

This matter has been referred to USEPA, Region 5 for appropriate action. If formal action is initiated, you will be issued a notice of violation informing you of how to proceed in resolving this matter. Please direct any response to this letter and any questions to Dave Sampias at 219/757-0291.

Sincerely,

J. Robert Simmons **Deputy Director** 

Northwest Regional Office

JRS/dcs ACES No. 99092

cc: Office of Air Quality Enforcement Section

File

				III. CASE IN	IFO.	RMATIC	)N						±3.
Α.	D	Pate of Inspection(s) or F	\e	view(s) Prompting This Referral:		98 3rd <sup>t</sup> and 4 arter Report		Planne	d Follo	w-up	Date(s):	V/A	
B.	R	eferral is the Result of a	ı N	Multi-Media Inspection:		Yes	X	No					•
C.	Iı	nspector or Program Cor	nta	act Person (If different from person maki	ng this i	referral):				-			
D.	Iı	npacted Area: Ambie	ent	t Air									
E.	ν	iolation Classification (	If a	applicable) R.E.R.	SNO	C/HPV		Compl	aint	X	Non-Attain	ment Area	a
F.	S	pecific Violations (Does	s no	ot need to be completed for Hazardous Wa	ste case	es):				-			
		<u>DATE OF VIOLATION</u>		STATE / FEDERAL - IC, IAC, PERMIT			TED		<u> </u>	LATIC	ON DESCRIPTI	<u>ON</u>	
		July 02, 2008		Permit Condition D.2.4(e)(1) emissions for coke oven offtake (6.7%) No. 2 Coke Battery.		he allowab g (5%) wa			perm	itted ent (5	le emission from mor 5%) of obse	e than	five
		July 16, 2008		Permit Condition D.2.4(a), D.2 emissions for coke oven door ( No. 7 Coke Battery.					perm	itted nt (1	le emission from mon .0%) of obs	e than	ten
		July 25, 2008		Permit Condition D.2.26 Nation Hazardous Air Pollutants (N. Pushing, Quenching and Battery CCCCC	ESHA	P) for Co	ke O	vens;	emiss stand maint subpa period malfu	sion lards, tenanart at ds of	be in compli limitations, v and op- ice requirem all times, e f startup, sh on as defined	work prace eration nents in except du nutdown, by 63.2	and this tring and
	•	August 12, 2008		Permit Condition D.2.4 (c) emissions for coke oven pushes (32.5%) during compliance n Battery.	(20%	opacity) wa	s exce	eded	opera perce conse	ition int (i cutiv	during to shall not ex 20%) opactor re readings to determine	xceed two ity. Six s shall	enty (6)
		August 27, 2008	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Permit Condition D.2.4(e)(1) emissions for coke oven offtake (7.3%) No. 2 Coke Battery.	tl pipin	he allowab g (5%) wa	le vi	isible eeded	permi	itted nt (5	le emission from mor 5%) of obse	e than	five
		September 02, 2008		Permit Condition D.2.4(e)(1) emissions for coke oven offtake (6.8%) No. 2 Coke Battery.		he allowab g (5%) wa			permi	itted nt (5	le emission from mor 5%) of obse	e than	five
		September 04, 2008		Permit Condition D.2.4(e)(1) emissions for coke oven offtake (5.6%) No. 2 Coke Battery.		he allowab g (5%) wa			permi perce offtak	itted nt (5 ces	le emission from mor 5%) of obse	e than erved bat	five ttery
		September 05, 2008		Permit Condition D.2.4(e)(1) emissions for coke oven offtake (5.6%) No. 2 Coke Battery.	: tl	he allowab g (5%) wa	le vi s exce	isible eeded	permi	itted nt (5	le emission from more 5%) of obse	e than	five
		December 20, 2008		Permit Condition D.2.4(a), D.2 emissions for coke oven door ( No. 7 Coke Battery.	.5(e): 10%) <sup>-</sup>	the allowa was exceede	ble vi	isible 2.7%)	permi	itted nt (1	le emission from mor 0%) of obs	e than	ten
G.				e inspections, etc., that led up to or			covery	y of the v	riolation	n(s):			

T089-7663-00121

US Steel-Gary Works Gary, Indiana Permit Reviewer: Gail McGarrity

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

## PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: U.S. Steel - Gary Works

Source Address: One North Broadway, Gary, Indiana 46402 Mailing Address: One North Broadway, Gary, Indiana 46402

Part 70 Permit No.: T089-7663-00121

Months: July 1 to September 30 Year: 2008

This report shall be submitted quarterly based on a calculate the date(s) of each deviation, the probable cause of the be reported. A deviation required to be reported pursual independent of the permit, shall be reported according and does not need to be included in this report. Additional deviations occurred, please specify in the box marked to	e deviation, and the response steps taken must ant to an applicable requirement that exists to the schedule stated in the applicable requirement anal pages may be attached if necessary. If no
☐ NO DEVIATIONS OCCURRED THIS REPORTING	PERIOD.
☑ THE FOLLOWING DEVIATIONS OCCURRED THI	S REPORTING PERIOD.
Permit Requirement (specify permit condition #) D.2.4	(e)(1) and D.2.5(c)
Date of Deviation: 7/2/08	Duration of Deviation: Not applicable
Number of Deviations: 1	#2BAKER)
Probable Cause of Deviation: 6 offtake leaks out	of 90 observed 303 #2 6.10 h
Response Steps Taken: Patch and seal leaks on t	the leaking offtakes
Permit Requirement (specify permit condition #) D.2.	4(a) and D.2.5(e)
Date of Deviation: 7/16/08	Duration of Deviation: Not applicable
Number of Deviations: 1	A RY Commit
Probable Cause of Deviation: 19 door leaks out o	f 150 observed #18 12.7 h
Response Steps Taken: Seal leaks on the leaking	



# INSPECTION SUMMARY

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Seconds Per Charge / Oven No. Total Seconds for 45.0  1. 9.0 / 8  2. 9.0 / 10  3. 6.0 / 13  4. 9.5 / 14  5. 9.5 / 14	# Ovens Out of Service = 7 Total Leaking Offtakes = 6  # Offtakes Not Observed = 10  # Offtakes Observed = 20	# Ovens Out of Service = \( \) Total Leaking Lids = \( \) # Lids Not Observed = \( \) \( \	Total # Collector Main Leaks Observed =	# Ovens Out of Service =	Inspection Data	INSPECTOR   Control   Control   CITIZENS GAS (Indianapolis)   MITTAL (Burns Harbor)   CITIZENS GAS (Indianapolis)   5   7   E
Charging Inspection  Limit = 60 Second for five charges (Log for 30 day rolling average)  PRELIM. COMPLIANCE STATUS:	No. Offtake Leaks  No. Offtakes Observed  \[ \frac{\oldsymbol{\oldsymbol{O}}{\oldsymbol{O}}}{\oldsymbol{O}} \]  \[ \frac{\oldsymbol{O}}{\oldsymbol{O}} \]	No. Lid Leaks  No. Lids Observed  O  Leakage  Lid Inspection Limit  PRELIM. COMPLIANCE STATUS:  IN  OUT	· · · · · · · · · · · · · · · · · · ·	1 ≒ −	ent I	SHIFT A US STEEL (Gary)  H



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## DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR MANAGEMENT NORTHWEST OFFICE

### COKE OVEN DOOR EMISSIONS EVALUATION

	Battery Number
15 1.78	5 🖂 7 💢
15 . 4.8 19 01 - Partie 7/16/08	

Company: U.S. STEEL, GARY WORKS 1 North Broadway

Address:

Gary, IN

Lake County

Inspector's Namez

Sky Condition:

Ambient Temperature

Stop Time 1203 Push Side Traverse Start Time (20) Coke Side Traverse Start Time Stop Time 12 Push Oven Coke Coke Push Coke Oven Push Oven No. Side\_ Side Side Side No. Side Side No. W <u>7</u>6 

Total Number of Ovens: 77	No. Door Leaks  No. Doors Observed X 100 = Percent Leakag
Ovens Out of Service:	$\frac{19}{100} \times 100 = 12.7\%$ Leakage

LIMIT PER 326 IAC 6-1-10.2

Compliance Status:

T089-7663-00121

US Steel-Gary Works Gary, Indiana Permit Reviewer: Gail McGarrity

Permit Requirement (specify permit condition #) D.2.26

**Duration of Deviation:** Not applicable Date of Deviation: 7/25/08

Number of Deviations: 1

Probable Cause of Deviation: No. 7 Coke Battery shutdown was on July 18, 2008 due to a scheduled waste heat stack canal repair. The ovens were charged and collector mains pressured with steam and nitrogen. The purge medium burned away the carbon buildup and the cracks and joints in the oven chambers were opened resulting in raw coke oven gas to penetrate the heating flues after recharging.

Response Steps Taken: Adjusted draft setting and air to gas ratio for normal operations, inspected oven walls and floors for spraying, ceramic welding, and dry gunning.

Permit Requirement (specify permit condition #) D.2.4(c)(2)

Date of Deviation: 8/12/08 Duration of Deviation: Not applicable

Number of Deviations: 1

Probable Cause of Deviation: The deterioration of the walls and flues due to ram forces exerted on the walls over time along with water running down onto the first through third flues for 41 and 42 which led to low temperatures on the fourth control flue.

Response Steps Taken: Inspected flues for 41 and 42 oven walls, gas channels and waste heat elbows. Repaired the leaking water pipe and swab 41 and 42 pusher side and coke side guns.

Permit Requirement (specify permit condition #) D.2.4(e)(1) and D.2.5(c)

**Duration of Deviation:** Not applicable Date of Deviation: 8/27/08

Number of Deviations: 1

Probable Cause of Deviation: 7 offtake leaks out of 96 observed

Response Steps Taken: Patch and seal leaks on the leaking offtakes

Permit Requirement (specify permit condition #) D.2.4(e)(1) and D.2.5(c)

**Duration of Deviation:** Not applicable Date of Deviation: 9/2/08

Number of Deviations: 1

Probable Cause of Deviation: 6 offtake leaks out of 88 observed

Response Steps Taken: Patch and seal leaks on the leaking offtakes

#### **Pushing Observations**



Date 08/12/08

Battery No. (2) 5 7

Start Time

727 C

Observer JON Simpson

Finish Time 1046

Door Duration Push Travel																			
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Oven No. Of Door Removed Exceeding 20% Opacity Before Push Passed (Extended) Oven Nos.:	Temperature 78
Passed (Out of Service) Oven Nos: Passed (Green) Oven Nos.:	Wind Speed Wind Direction
Other Comments:	Humidity 90%
Gas Cleaner 912 9119 Baghouse Door Machin	e: East West

070101 Push Ops VE Sheets.xls (Push)



U.S. Steel Gary Works Method 9 Criteria Determination Pushing Observations

Battery No.: 7 Observer Name: Time Begin: 0839 Time End: Source Overcast No sun visible for Push on Oven Nos. Ю Ø . 20 S Observer

Signature:

re: Jon Dingson

070101 Method 9 Criteria Determination.doc

ENTROMENT - HEALTH - SAFET AIR - LAND - WATER - WAST	KERAMID
HEALTH · SAFE NATER • WAST	MID

# INSPECTION SUMMARY

Mal	7119	11935		11009	Inspection Times Start Fini	
1338	1184	lla?		ES	n Times Finish	PLAN
Seconds Per Charge / Oven No.  1. 11.0 / 40  2. 11.0 / 48  3. 11.5 / 44  5. 10.0 / 44	# Ovens Out of Service = 7  # Offtakes Not Observed = 4  # Offtakes Observed = 96	# Ovens Out of Service = 7  # Lids Not Observed = 8  # Lids Observed = 93	Total # Collector Main Leaks Observed =	# Ovens Out of Service = 7 H  # Doors Not Observed = 10 (  Total # Doors Obs. = 40 7	Inspection D	CITIZENS GAS (Indianapolis)  TTERY NO.:           2
Total Seconds for  Five Charges = \$4, \$  6/	Total Leaking Offtakes =	Total Leaking Lids = 1		PS Doors Leaking = 1  CS Doors Leaking = 1  Total Leaking Doors = 3	ta	الها المالة (TYAL (Burns Harbor)
Charging Inspection  Limit = 60 Second for five charges (Log for 30 day rolling average)  PRELIM. COMPLIANCE STATUS:	No. Offiake Leaks x 100 = Percent Leakage  No. Offiakes Observed x 100 = Percent Leakage  7, 3 <sup>2</sup> 1 % Leakage  Offiake Inspection Limit% for 30 day rolling average  PRELIM. COMPLIANCE STATUS: INOUT	No. Lid Leaks x 100 = Percent Leakage  No. Lids Observed  • \$3 % Leakage  Lid Inspection Limit % for 30 day rolling average  PRELIM. COMPLIANCE STATUS: NO OUT		Door Inspection Limit% for 30 day rolling average  PRELIM. COMPLIANCE STATUS:INOUT	No. Door Leaks x 100 = Percent Leakage	SHIFT S US STEEL (Gary)  H



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KERAMIDA ENTROMENT - IDALTH - RAPTY AIR - LAND - WATER - WASTE

# INSPECTION SUMMARY

DATE 9-2-08

INSPECTOR (Swellen)

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T089-7663-00121

US Steel-Gary Works Gary, Indiana

Permit Reviewer: Gail McGarrity

te of Deviation: 9/4/08	Duration of Deviation: Not applicable
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obable Cause of Deviation: 5 offtake	e leaks out of 90 observed \$2 BATETY 303 Juny

Date of Deviation: 9/5/08	Duration of Deviation: Not applicable
Number of Deviations: 1	
Probable Cause of Deviation:	: 5 offtake leaks out of 90 observed # 3 BME 303 JWP)

Permit Requirement (specify permit condit	ion #) C.1(a) and D.2.5(i) (See Attachment 1)
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document is true, accurate and complete.

Form Completed By:	Lawrence W. Sutherland
Title/Position:	Division Manager, Coke Operations
Date:	October 17, 2008
Phone:	219.888.4028



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Seconds Per Charge / Oven No.  1. 38.5 / 2.1  2. 11.5 / 2.3  3. 9.5 / 3.1  4. 65.5 / 3.5  5. 10.5 / 3.5	# Ovens Out of Service = 7  # Offtakes Not Observed = 10  # Offtakes Observed = 50	# Ovens Out of Service = 7  # Lids Not Observed = 20  # Lids Observed = 180	Total # Collector Main Leaks Observed =	# Ovens Out of Service =	CITIZENS GAS (Indianapolis
Total Seconds for 135,5 Five Charges = 6. 47,5 / 37	Total Leaking Offfakes =	Total Leaking Lids = 6		PS Doors Leaking = 4  CS Doors Leaking = 1  Total Leaking Doors = 3	N SUMMARY  المحدالون  TTAL (Burns Harbor) [  المحدالون
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#### 633 वाक 600 625 Inspection Times 638 636 1270 1269 Finish DATE 95-08 PLANT: CITIZENS GAS (Indianapolis) BATTERY NO.: # Ovens Out of Service = # Ovens Out of Service = # Doors Not Observed = # Ovens Out of Service = # Offtakes Observed = # Lids Observed = # Lids Not Observed = # Offtakes Not Observed = Total # Collector Main Leaks Observed = Total # Doors Obs. = Seconds Per Charge / Oven No いい 2. 10,0 S نن (0 INSPECTOR B 8 æ 00 5 ۵ <sup>2</sup>X Inspection Data INSPECTION SUMMARY Charlens MITTAL (Burns Harbor) CS Doors Leaking = PS Doors Leaking = Total Leaking Offtakes = Total Leaking Doors = Five Charges = Total Seconds for Total Leaking Lids = 78.5 [1] 0 0 Ś US STEEL (Gary) No. Offiakes Observed x 100 = Percent Leakage No. Lids Observed No. Doors Observed Offtake Inspection Limit No. Door Leaks Charging Inspection PRELIM. COMPLIANCE STATUS: No. Lid Leaks PRELIM. COMPLIANCE STATUS: (Log for 30 day rolling average) Limit = 60 Second for five charges PRELIM. COMPLIANCE STATUS: PRELIM. COMPLIANCE STATUS: Door Inspection Limit \_\_\_\_\_% for 30 day rolling average Lid Inspection Limit\_ SHIFT 6 Percent Leakage Calculations S. 56 % Leakage x 100 = Percent Leakage x 100 = Percent Leakage \_% for 30 day rolling average \_% for 30 day rolling average Z 뉟 Z Lour OUT OUT TUOUT



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1	f Offtakes						S		İ	ids Leakir						<u>o</u>								
Comn	nents:																							
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T089-7663-00121

US Steel-Gary Works Gary, Indiana Permit Reviewer: Gail McGarrity

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

## PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: U.S. Steel - Gary Works

Source Address: One North Broadway, Gary, Indiana 46402 Mailing Address: One North Broadway, Gary, Indiana 46402

Part 70 Permit No.: T089-7663-00121

Months: October 1 to December 31 Year: 2008

Page 1 of 2

This report shall be submitted quarterly based on a cal the date(s) of each deviation, the probable cause of the be reported. A deviation required to be reported pursual independent of the permit, shall be reported according and does not need to be included in this report. Additional deviations occurred, please specify in the box marked	e deviation, and the response steps taken must ant to an applicable requirement that exists to the schedule stated in the applicable requirement onal pages may be attached if necessary. If no
☐ NO DEVIATIONS OCCURRED THIS REPORTING	PERIOD.
☐ THE FOLLOWING DEVIATIONS OCCURRED TH	IS REPORTING PERIOD.
Permit Requirement (specify permit condition #) D.2.4	4(a), D.2.5(e)
Date of Deviation: 12/20/08	i i i
Number of Deviations: 1	# 5 Bareay 303
Probable Cause of Deviation: 17 Door leaks out	Duration of Deviation: Not applicable $45 \text{ Barren} 303$ of 142 observed $12.0^{3/0}$
Response Steps Taken: Sealed leaks on the leak	ing doors
Permit Requirement (specify permit condition #) C.1	(a) and D.2.5(i) (See Attachment 1)
Date of Deviation:	Duration of Deviation: Not applicable
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

-	
	KERAMIDA ENVIRONMENT - UIŽALTII - SABETY AUR - LAND - WASTER - WASTE

# INSPECTION SUMMARY

PLANT: CITIZENS GAS (Indianapolis)

MITTAL (Burns Harbor)

US STEEL (Gary) SHIFT 6

85-06-61

INSPECTOR \_

1040	1018	800		OBB.	Inspection Times Start Fini
	1030	1033	ė.	905	sh
Seconds Per Charge / Oven No.  1. 2.0 / 6/1.  2. 9.5 / 3  3. 4.5 / 15  4. 1,5 / 18  5. 2.0 / 3.3	# Ovens Out of Service = 6  # Offtakes Not Observed = 6  # Offtakes Observed = 136	# Ovens Out of Service = 6 # Lids Not Observed = 6 # Lids Observed = 204	Total # Collector Main Leaks Observed =	# Ovens Out of Service = 6  # Doors Not Observed = 6  Total # Doors Obs. = 143	BATTERY NO.: 1 2 5 Inspection Data
Total Seconds for Five Charges = 6. /	Total Leaking Offtakes =	Total Leaking Lids = C		PS Doors Leaking = 10  CS Doors Leaking = 7  Total Leaking Doors = 17	7 7 E
Charging Inspection  Limit = 60 Second for five charges (Log for 30 day rolling average)  PRELIM. COMPLIANCE STATUS:  IN OUT	No. Offtake Leaks  No. Offtakes Observed  a 74 % Leakage  Offtake Inspection Limit % for 30 day rolling average  PRELIM. COMPLIANCE STATUS: IN OUT	No. Lid Leaks x 100 = Percent Leakage  No. Lids Observed		No. Doors Observed  \( \lambda \lambda \frac{\lambda \frac{\frac{\lambda \frac{\frac{\lambda \frac{\frac{\lambda \frac{\	H Percent Leakage Calculations  No. Door Leaks  100 = Percent Leakage



#### COKE OVEN DOOR EMISSIONS INSPECTION

	*****	3 40-03		INS	PECTOR		سرا إ إ ب		-	
LANT:	CITIZE	VS GAS (	Indianapo	lis)	MITTA	L (Burns H	Iarbor)	] us s	TEEL (Ga	ry)
	BATTE	RY NO.:	. I	2	5	X	7	E	н	
	Oven No.	Push Side	Coke Side	Oven No.	Push Side	Coke Side	Oven	Push	Coke	٠.
	1	Side	Side	32	Side	Side	No. 63	Side	Side	
	2			33	<del> </del>		64	<del>                                     </del>		
	3			34			65	X		
	4			35			66			
	5			36	005		67	4. m		
	6			37	1000		68		•	
ang dan dan	7.			38	Çin 7		69			
	8			39	ļ	·	70	×	×	
	9			40	×		71	-		
	11			42	<del>                                     </del>		72			
	12	×		43	<del> </del>		74			
	13			44	<b> </b>		75	$\prec$	<del>-</del> <del>-</del> <del>-</del>	
	14			45			76			
	15			46			77			
	16			47 .	X		78			
	17		:	48			79			
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	19			50	06)		81			
	20			51	Cis		82			
	21		X	52	×	_ <u>×</u> _	83			
	22			53	\	$\rightarrow$	84 85			
	24			55	×	×	86			
•	25			56		<del></del>	87			
	26			57			88			
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. [	28		·	59			90			
	29			60	×	×	91			
ļ	30			61			92			
·	31			62	L		93			
	Push Side	Traverse	e:	Start Tim	ie <u>186</u>	Stop	Time S	57_		
3.25	Maximum	Time (sec	3) 40	Ac	tual Time	ี ชว	Valid l	Run 🔭	rПn	
49	Coke Side			Start Tim				<del></del>	· L	
	Maximum		2.3	k	tual Time	Stop		Run 内内	( N	
Total Nun	nber of Ov	ens	<u>,                                     </u>	* * *				Legend		
Ovens Qu	t of Servic	e	<b>.</b>			X = Lea	ık (	OOS = Ou	t-Of-Servi	ce
Total Nun	nber of Do	ors		154		BL = B	locked (	O = Off		
Number o	f Doors N	ot Observe	ed	0		:	S	ummary		
Total Nun	nber of Do	ors Obser	ved _	143		Push Si	de Door Lea	ks	10	
Back Press	sure:	~ 45S	fu	446		Coke Si	de Doors Le	aks	2	
<u> </u>	$\overline{c}$	E 411	fw	<i>S</i> 93		<u>L</u>		<del></del>		
Comments		- :	: ''	·····						

#### IDEM AIR COMPLIANCE BRANCH HIGH PRIORITY VIOLATION CHECKSHEET

Source and Permit II US Steel 089-001	)#	for any violation. Then comp Source Na US Steel Gary	me	real control of the	ector Nan e Sampi	ne
Date of Violation 3 <sup>rd</sup> & 4 <sup>th</sup> Qtr 2008	Date vio	lation was discovered & 4 <sup>th</sup> Qtr 2008	How discovered	(Select One) Record Rev	riew	
Section A.					YES	NO
A1. (a.) Did this violation	occur at a n	najor CAA source (Title	e V source)?	A second	$\square$	
(b.) Did this violation	relate to a p	pollutant for which this	source is major?		$\boxtimes$	
A2. (a.) Did this violation	occur at a s	ynthetic minor (FESOP	or SSOA)?			
(b.) Did this violation	affect the sy	ynthetic minor's status	as a minor?			
If "Yes" to Section A2.(a.)  If "No" to both Section A  (Note: But if you wish t	1 and Sectio	on A2 this is not a Hig	gh Priority Violati	ion. STOP a		
Section B. General Criteria					YES	NO
		permit (and/or to installets) and/or major permit		permit		
B2. Was this a violation of	of air toxics r	requirement (NESHAP, g parameter restriction?	MACT) that resul	ted in excess	$\boxtimes$	
B3. Did this violation affe	ect the synthe	etic minor source's PSI limits PTE? Explain in	O, NSR or Title V s			
		ve term of local, state o				
		a Title V Annual Com	pliance Certification	on? (i.e.		$\boxtimes$
		le V permit application	?			$\boxtimes$
			a an reporting that			
B7. Was this a violation of substantially interfere an applicable emission	ed with enfor	onitoring, recordkeeping cement of determining	the source's comp	liance with		
substantially interfere an applicable emissio	ed with enfor on limit?	onitoring, recordkeeping cement of determining ale emission limit during	the source's compl	liance with		
substantially interfere an applicable emissio B8. Was this a violation of any margin?)	ed with enfor on limit? of an allowab	cement of determining	the source's compleg a stack test? (i.e.	liance with		
substantially interfere an applicable emission B8. Was this a violation of any margin?) B9. Was this a violation be B10. Was this a substantial Management Plan?)	ed with enforon limit? of an allowab oy a chronic of	recement of determining ole emission limit during or recalcitrant violator?	the source's compleg a stack test? (i.e.	liance with Failed by		
substantially interfere an applicable emission B8. Was this a violation of any margin?) B9. Was this a violation be B10. Was this a substantial Management Plan?) Directions:	ed with enfor in limit? of an allowab by a chronic of	recement of determining of the emission limit during or recalcitrant violator?  Section 112(r)? (i.e. F	the source's complege a stack test? (i.e.	liance with  Failed by  Risk		
substantially interfere an applicable emission B8. Was this a violation of any margin?) B9. Was this a violation be B10. Was this a substantial Management Plan?) Directions: If "Yes" to Section A1.(	ed with enform limit? of an allowab oy a chronic of l violation of	cement of determining ble emission limit during or recalcitrant violator?  Section 112(r)? (i.e. F	the source's complete g a stack test? (i.e.  Failed to submit a Reson A2.(a) and A	liance with Failed by Risk  2.(b) AND a	uny one o	
substantially interfere an applicable emission B8. Was this a violation of any margin?) B9. Was this a violation be B10. Was this a substantial Management Plan?) Directions:	ed with enform limit? of an allowab oy a chronic of l violation of	cement of determining ble emission limit during or recalcitrant violator?  Section 112(r)? (i.e. F	the source's complete g a stack test? (i.e.  Failed to submit a Reson A2.(a) and A	liance with Failed by Risk  2.(b) AND a	uny one o	

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#### Page Two IDEM AIR COMPLIANCE BRANCH HIGH PRIORITY VIOLATION CHECKSHEET

#### Section C. Matrix Criteria

Violation	Method of Detection	Standard	Supplemental Significant Threshold	% in Excess of Reference Limit/Parameter	YES	NO
	Stack Testing	Any applicable requirement		Any violation of the applicable standard		
C1. Was this a violation of Allowable Emissions Limitations?	Coatings analysis, fuel samples, other process materials sampling or raw/process materials usage reports.	Any applicable requirement	CO 23 lb/hr NOx 9 lb/hr SO <sub>2</sub> 9 lb/hr VOC 9 lb/hr PM 6 lb/hr PM <sub>10</sub> 3 lb/hr	>15% of the applicable emission limitation or the supplemental significant threshold (Whichever is more stringent.)		
C2. Was this a violation of parameter limits where the parameter is a direct surrogate for an emissions limitation?	Continuous/ Periodic Parameter Monitoring (includes indicators of control device performance)	Any applicable requirement		>5% of the applicable parameter limit <sup>3</sup>		
C3. Was this a violation of	Continuous Emissions Monitoring (where the CEM is certified under federal performance specifications.	<24 hour averaging period (for example, one hour or three hour blocks	CO 23 lb/hr NOx 9 lb/hr SO <sub>2</sub> 9 lb/hr VOC 9 lb/hr	15% of the applicable standard or, the supplemental significant threshold(whichever is the more stringent)		$\boxtimes$
an applicable non- opacity Standard?	Continuous Emissions Monitoring (where the CEM is certified under federal performance specifications	>24 hr averaging period		Any violation of the applicable standard		
C4. Was this a violation of an applicable opacity	Continuous Opacity Monitoring	0-20% opacity >20% opacity		>5% opacity over the limit >10% opacity over the limit		
standard? 2	Method 9 VE	0-20% opacity		>50% over the limit		$\boxtimes$
	Readings	> 20% opacity		>25% over the limit		

#### Table Footnotes:

- 1. Supplemental Significant Threshold is based on PSD significant levels. The Significant Threshold value is the lb/hr rate at 8760 hours which would result in PSD review.
- 2. Based on the applicable averaging period (e.g. 6-minute block averages)
- 3. For the first reporting period. If exceedances occur for more than 25% of the operating time during the first reporting period evaluated, and if such exceedance continues during the subsequent consecutive reporting period, the exceedances will be considered.

#### Directions:

If "yes" to Section A1.(a) <u>and A1.(b)</u> or "yes" to Section A2.(a) <u>and A2.(b)</u> AND any one of the criteria in Section C (above), this violation qualifies as a HPV and must be reported. Now move on to Section E.

If "no" to choices in Section A and Section B or Section A and Section C, you may select Section D.

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Section D. Discretionary HPV:	YES	NO
1. Should this violation be on the HPVL based on other factors? If Yes, complete D.2.		
2. Provide justification for the discretionary recommendation to include violations of previously in Section B or Section C. Include duration, magnitude, environmental impact of the violation(s).		
Section E Summary: Is this violation a High Priority Violation?	YES	NO
Section E Summary: Is this violation a High Priority Violation?  Are any questions in Section A <u>and</u> Section B, Section C or Section D answered "Yes"?  If "Yes" to the question above the violation is a HPV.  If "No" to the question above the violation is not a HPV.	YES	NO
Are any questions in Section A <u>and</u> Section B, Section C or Section D answered "Yes"?  If "Yes" to the question above the violation is a HPV.	YES	No